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Attorney for Plaintiff and the Proposed
 Class

Attorneys for Defendant
 L'ORÉAL USA, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

Ligon,

 Plaintiff,

 vs.

 L'Oréal USA, Inc.,

 Defendant.

Case No. 3:12-cv-04585-RGS

**JOINT STIPULATION AND ~~[PROPOSED]~~
 ORDER EXTENDING TIME TO
 RESPOND TO THE COMPLAINT AND
 CONTINUING CASE MANAGEMENT
 CONFERENCE AND RELATED
 DEADLINES**

Pursuant to Local Rule 6-2, Plaintiff Nancie Ligon ("Plaintiff) and Defendant L'Oréal USA, Inc. ("L'Oréal or Defendant") hereby submit, through the undersigned, the following Joint Stipulation requesting a further extension of time for L'Oréal to respond the complaint and continuing for approximately 30 days the scheduled initial Case Management Conference and related deadlines.

WHEREAS on August 30, 2012, Plaintiff filed her complaint in the above-titled action in the United States District Court, Northern District of California;

WHEREAS on September 6, 2012, Plaintiff served her complaint on Defendant;

JOINT STIPULATION EXTENDING TIME
 Case No. 3:12-cv-04585-RGS

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1 WHEREAS Defendant's responsive pleading deadline was originally September 27, 2012,
2 but was extended by stipulation to November 16, 2012;

3 WHEREAS on October 15, 2012, the Court ordered a CMC to take place on January 17,
4 2013 at 10:00 a.m.;

5 WHEREAS on October 25, 2012, pursuant to stipulation, the Court further extended
6 L'Oréal's response deadline to January 29, 2013 and continued the CMC date to February 21,
7 2013 to allow the parties time to engage in informal discovery and to discuss the claims and
8 defenses;

9 WHEREAS the parties are still engaging in informal discovery on a confidential basis and
10 analyzing and discussing claims and defenses and would like the time to complete this process
11 before moving forward with litigation;

12 IT IS THEREFORE STIPULATED AND AGREED by and among Plaintiff and L'Oréal
13 through the undersigned, to extend L'Oréal's responsive pleading deadline to March 1, 2013, to
14 postpone the CMC until March 21, 2013 at 10:00 a.m. , or until the first available date thereafter,
15 and to continue all dates relating to the CMC accordingly.

16 SO STIPULATED:
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1 DATED: January 22, 2013.

FARELLA BRAUN + MARTEL LLP

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3 By: /s/
C. Brandon Wisoff

4 Attorneys for Defendant L'Oréal USA, Inc.

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6 DATED: January 22, 2013.

THE MEHDI FIRM

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9 By: /s/
Azra Z. Mehdi

10 Attorney for Plaintiff and the Proposed Class

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13 **ATTESTATION PURSUANT TO CIVIL L.R. 5-1**


14 I, Brandon Wisoff, am the ECF User whose ID and password are being used to file this
15 Stipulation And Proposed Order. In compliance with Civil L.R. 5-1, I hereby attest that the
16 concurrence in the filing of this document has been obtained from each of the signatories. I
17 declare under penalty of perjury under the laws of the United States of America that the foregoing
18 is true and correct.

19 Executed this 22nd day of January 2013.

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21 /s/
C. Brandon Wisoff

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23 PURSUANT TO STIPULATION, IT IS SO ORDERED

24 DATED: January 22, 2013.

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26 Hon. Richard Seeborg
27 United States District Judge
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